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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

KAREN LASMARIAS, an Individual

Plaintiff,

vs.

UNIVERSITY MEDICAL CENTER OF
SOUTHERN NEVADA, dba
UNIVERSITY MEDICAL CENTER, a
government entity; HELLENE LOPEZ, an
individual,

Defendants.

CASE NO.: 2:18-cv-01851-JCM-NJK

**STIPULATION AND ORDER TO STAY
DISCOVERY PENDING RESOLUTION
OF RELATED CRIMINAL MATTER**

(Third Request)

Pursuant to LR IA 6-1 and 6-2, and pursuant to LR 7-1, Plaintiff Karen Lasmarias (“Plaintiff”), by and through her undersigned counsel; Defendant Hellene Lopez (“Lopez”), by and through his undersigned counsel; and Defendant University Medical Center of Southern Nevada d/b/a University Medical Center (“UMC”), by and through its undersigned counsel; hereby stipulate and agree, and respectfully request that the Court stay all discovery in this action pending the resolution of an ongoing criminal matter arising from the same and/or related allegations to those set forth in Plaintiff’s Complaint in this action. Due to the pendency of the criminal matter in which Lopez is a Defendant, the parties anticipate that Defendant Lopez would be limited in his ability to substantively participate in discovery in this action without either implicating or otherwise being compelled to waive his Fifth Amendment rights.

On February 24, 2019, the parties submitted a first request to stay discovery in this matter pending resolution Lopez' ongoing criminal matter. See Stipulation and Order to Stay Discovery Pending Resolution of Related Criminal Matter (First Request) [ECF No. 24]. The Court subsequently approved the stipulation and ordered the stay. See Order [ECF No. 25].

On August 19, 2019, the parties submitted a second request to stay discovery in this matter pending resolution Lopez' ongoing criminal matter. See Stipulation and Order to Stay Discovery Pending Resolution of Related Criminal Matter (Second Request) [ECF No. 26]. The Court subsequently approved the stipulation and ordered the stay on August 19, 2019. See Order [ECF No. 27].

On October 8, 2019, Lopez' ongoing criminal matter was continued to January 07, 2020.

Accordingly, the parties stipulate and agree, and respectfully request that the Court stay all discovery in this action for an additional six (6) months pending resolution of the ongoing criminal matter. In the event the criminal matter is resolved prior to the expiration of the stay, the parties stipulate and agree to promptly notify this Court of said resolution so that the stay can be lifted and discovery may commence unhindered in this action. In the event the criminal matter is not resolved within the requested stay period of six (6) months to **April 24, 2020**, the parties stipulate and agree to coordinate in good faith to request from this Court any further relief as may be necessary to avoid conflict with the ongoing criminal matter, including but not limited to, a request to extend the stay.

DATED this 13th day of November, 2019

DATED this 13th day of November, 2019

**MULLINS & TRENCHAK, ATTORNEYS AT
LAW**

**HOLLEY DRIGGS WALCH
FINE PUZEY STEIN & THOMPSON**

/s/ Philip J. Trenchak

/s/ F. Thomas Edwards

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Attorneys for Defendant University

Medical Center of Southern Nevada

1 DATED this 13th day of November, 2019

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DATED this 13th day of November, 2019

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/s/ Jeffrey Gronich

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Attorneys for Defendant Hellene Lopez

12 **IT IS SO ORDERED**

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15 UNITED STATES MAGISTRATE JUDGE

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17 Dated: November 14, 2019
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